UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION NO. 5:14-CR-126-FL

UNITED STATES OF AMERICA,)	
)	
V.)	MOTION FOR A DOWNWARD VARIANCE
)	
KEYONA TENEA SHEARS,)	
Defendant.)	

COMES NOW the defendant, Keyona Tenea Shears (Keyona), by and through undersigned counsel, and hereby files this Motion for Downward Variance pursuant to 18 U.S.C. § 3553(a)(1-7). As grounds in support of this Motion, the undersigned respectfully herein incorporates the arguments asserted in the Sentencing Memorandum filed just after this Motion.

Respectfully submitted 28th December 2015.

GREENE & WILSON, P.A.

/s/ Thomas R. Wilson
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CJA Panel- Appointed

CERTIFICATE OF SERVICE

I hereby certify that I this day have served a copy of this pleading upon the other parties to this action electronically as indicated to counsel for said parties, this 28th day of December, 2015.

Jason Kellhofer, AUSA (via CM/ECF)

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